DRAFT MODIFICATIONS to MONTANA WIA 2-YEAR STATE PLAN

9/02/2005

In Montana's Strategic 2-Year Plan, 4 priorities were identified for improving the State Workforce Investment System: Expand the One-Stop System; Increase collaboration of partners and integration of services; Increase the use of Waivers to address rural needs in Montana; and Improve the development and delivery of workforce information.

To a large extent, these priorities align with those of the U.S. Department of Labor (USDOL) and reflect a long-standing commitment to high quality customer service that responds to customers needs while maximizing the resources available. In a continuous effort to realize these priorities and the goals set forth in the 2-Year Strategic Plan, Montana is requesting approval of Modifications to the Strategic 2-Year Plan as follows.

Section I - State Vision

No Changes required.

Section II – State Workforce Investment Priorities (pg. 8 of original Plan)

Identify the Governor's key workforce investment priorities for the State's public workforce system and how each will lead to actualizing the Governor's vision for workforce and economic development. (\S 111(d)(2) and 112 (a).)

MODIFY TO Add Priority #5.

5. Eliminate Duplicative Administrative Systems and Maximize Opportunities for Training.

Governor Schweitzer plans to move toward creation of a single workforce area when regulations and statute permit. In order to move Montana in that direction, the Governor will name two workforce areas within the state designated to function as a single statewide planning area. By doing so, it is estimated Montana will reduce overhead costs in the local areas from 20% to 4% after the transition year, a reduction of almost \$1 million that is now spent to support the current structure. This efficiency maximizes the available money directed to training and services to business and job seekers in the face of the severe federal budget cuts experienced by the state in the last four years.

The new statewide regional planning structure will enhance efforts to transform the system into a demand-driven system, and align with 3 of the priorities set forth in the original Strategic 2-Year Plan to: expand the One-Stop System, increase collaboration of partners and integration of services, and increase the use of Waivers to address rural needs in Montana. In addition, the fifth priority identified above will be added as part of this Plan Modification.

This priority requires Montana to request a Waiver to apply 20 CFR 661.300(f), which permits a state board to carry out the roles of a local board in a single local area, to a statewide regional planning area.

Section III - State Governance Structure (pg. 12 of original Plan)

- B. 1. Describe the organization and structure of the State Board. (§111).)
 - 2. Identify the organizations or entities represented on the State Board. If you are using an alternative entity which does not contain all the members required under section 111(b)(1), describe how each of the entities required under this section will be involved in planning and implementing the State's workforce investment system as envisioned in WIA. How is the alternative entity achieving the State's WIA goals? ($\S111(a-c)$, 111(e), and 112(b)(1).)

Governor Schweitzer will issue a new Executive Order continuing membership of the State Board, and clarifying the role of the SWIB. The Governor considered the transition to a single statewide planning area when making appointments to the State Board in August 2005, and the SWIB was restructured to: incorporate additional private sector members to ensure a business majority and increase the representation of key industries; ensure local elected officials are represented on the SWIB; ensure geographic representation, with the goal of increased local involvement and influence.

During PY 05, the SWIB will develop recommendations for forming a Youth Council, either as an independent arm of the SWIB, or as a committee that functions collaboratively under the direction of the SWIB.

Two organizational charts are attached as Attachments I (a.) reflecting the WIA organizational structure under the original 2-Year State Plan, and Attachment I (b.), showing the new organizational structure based upon a single statewide planning area.

Section V – Overarching State Strategies (pg. 29)

E. What State strategies are in place to ensure that sufficient system resources are being spent to support training of individuals in high growth/high demand industries?

MODIFY TO ADD:

In addition to the strategies identified in the original Strategic 2-Year Plan, and as a result of the new regional planning structure, Montana estimates a reduction of administrative overhead costs in the local areas from 20% to 4% after the transition year, a reduction of approximately \$1 million from what is now spent to support the current structure. This efficiency maximizes the available money directed to training and services to business and job seekers in the face of the severe federal budget cuts experienced by the state in the last four years.

J. Describe how the state will take advantage of the flexibility provisions in WIA for waivers and the option to obtain approval as a workflex State.

MODIFY TO ADD:

1. Statewide Regional Planning Area – State Workforce Investment Board

In the original Strategic 2-Year Plan, Montana committed to research and utilize as much flexibility as possible through the use of waivers to address local workforce needs specific to a rural state and its rural communities and tribal nations. Montana's low population density, coupled with the nation's fourth largest geographic area, puts the State in a position to take advantage of the use of waivers to be innovative and responsive in our approach to meet these

unique rural needs. Further, the Governor can streamline the administration of services, increase efficiency, and avoid duplication across the workforce investment system.

Based on research conducted in Montana's neighboring states and in nine other sparsely populated states, including North Dakota, South Dakota, Idaho, Wyoming, Utah, Alaska, Delaware, New Hampshire, and Vermont, all operate Workforce Investment Act programs on a single statewide planning or single service delivery model. This has enabled the states to create a streamlined and accountable workforce investment system.

a. With this Plan Modification, Montana is formally seeking a Waiver to apply 20 CFR 661.300(f), which permits a state board to carry out the roles of a local board in a single local area, to a statewide regional planning area. Montana has experienced a 53% drop in funding – \$8.0 million – since PY 2001. This bleak financial outlook makes change imperative. With the continuing loss of funds, maintenance of the existing system is no longer a viable option. While the Concentrated Employment Program (CEP) local area in Montana qualifies for automatic designation as a local area, the financial incentives originally associated with the automatic designation no longer exist.

Based on the above, the Governor, through his designee on the State Workforce Investment Board, has announced his desire to move Montana to a single statewide planning area. He intends to designate two workforce areas, establish a consortium of the two areas to conduct business, and develop a single regional plan for the statewide regional planning area beginning with PY07. The shift from two local areas to a single statewide planning area allows the Governor to address the Administration's strategic priorities and to further reforms envisioned in the Workforce Investment Act. To maximize resources available for service delivery, the state also wishes to use the State Workforce Investment Board (SWIB) as the local workforce board for the statewide planning area. This will also foster sharing of data and information across the state.

Governor Schweitzer will approve further modification of the 2-Year WIA State Plan as necessary, so as to be considered the single regional plan for the state through PY06.

- b. No state or local policies would limit the Governor's authority to require a regional plan or utilize the SWIB as the local workforce board.
- c. The State will achieve the following goals if the waiver is granted:
 - 1. The new single statewide planning structure will reduce overhead costs in the local areas from 20% to an estimated 4% after the transition year, a reduction of approximately \$1 million from what is now spent to support the current structure. This efficiency maximizes the available money directed to training and services to business and job seekers in the face of the severe federal budget cuts experienced by the state in the last four years.
 - 2. The new statewide structure will enhance efforts to transform the system into a demand driven system by further integrating services and increasing the SWIB's ability to achieve its goals established in the Strategic 2-Year Plan, one of which is to expand the number of One-Stops in the State. The priority of PYs 2005 and 2006 will be to provide training and support in an attempt to certify a minimum of one new One-Stop in each of Montana's Montana Association of Counties (MACo) Districts, excluding District 8 and 12. Within Districts 8 and 12, the state will strive to certify a minimum of one additional One-Stop within the next two years. The strategy in the original Strategic 2-Year Plan included promoting the role of

- Community Management Teams (CMTs) that were organized under the original WIA 5-Year Plan, including mandatory partners and many optional partners. Under the guidance, support and involvement of the SWIB members, Montana will work with service providers, local communities and elected officials, CMTs, and other partners to begin expanding the One-Stop system. This recognizes the importance of sharing data and information about new and expanding businesses to build the economy across regions.
- 3. By increasing the number of One-Stop Centers, the One-Stop system will be enhanced, broadening the reach to Montana's citizens and business customers, especially in our rural communities and on tribal nations. Montana wants to improve on the current system in which there is a One-Stop Center that is designated to serve 38 counties, spanning from the northwest corner of Montana, to the southeast corner...a distance of approximately 750 miles. Montana and the SWIB will work to negotiate new MOUs with One-Stop Partner organizations with the goal of expanding their participation in the One-Stop system to even more fully integrate the wider range of services available at the centers.
- 4. As stated above, during PY05 the SWIB will develop recommendations for forming a Youth Council, either as an independent arm of the SWIB, or as a committee that functions collaboratively under the direction of the SWIB. The new statewide delivery structure affords the SWIB an opportunity, while working closely with the Governor's Office of Indian Affairs and his Policy Advisor on Families, to redesign youth programs and target youth most at-risk, particularly in Montana's Native American population. During the transition, the state will, to the extent possible, honor the commitments made by the local boards, while identifying gaps and prioritizing services to those youth who demonstrate the greatest need.
- 5. The new statewide structure will strengthen administrative oversight and accountability processes. Administrative deficiencies have been found by the state and USDOL reviews and have resulted in substantial disallowed costs in Montana's BOS LWIB. Potentially there are additional costs that may be questioned and ultimately disallowed in the BOS and CEP local workforce areas. The new, strengthened administrative structure will assist Montana in avoiding future disallowed costs and thus will further enable the redirection of funds from administration to direct participant training and support.
- 6. With the change to a statewide regional planning structure and this waiver, Montana estimates increased training opportunities for an additional 350 or more adults, dislocated workers and at-risk youth as we add services for the business communities and tribal nations.
- d. The State Board met August 30, 2005 and was presented with a report from the Governor's designee on the Board, describing the statewide regional planning structure, and projecting the estimated reductions in duplicate administrative overhead costs, as well as the projected increases in participant and businesses that would be served under the statewide planning structure. After lengthy discussion and public comment, and in alignment with the Governor's direction to the Board, the SWIB moved unanimously to: direct staff to draft a modification to Montana's 2-Year Strategic Plan to move to a statewide regional planning area; include the provision for applying for a waiver to apply 20 CFR 661.300(f), which permits a state board to carry out the roles of a local board in a single local area, to a statewide regional planning area; and allow no less than a 2 week public comment period. A meeting was scheduled for September 20, 2005 at which the SWIB would take action on the Plan Modification and waiver request. The waiver was announced to the general public as part of the plan modification review process, which included a process for soliciting review and comment during a two-week period, and review by the Governor's State Workforce Investment Board on or before their meeting on September 20, 2005. The County Commissioners on the CEP Council of Commissioners and the Chairs of the Local WIBS received a personal phone call to advise them of the proposed change, and offer an opportunity to comment on the proposal.

- e. The individuals adversely affected by moving to a single statewide planning area are the staff of the LWIBs administrative entity, MJTP, Inc., and local board members. As part of the transition and consolidation, some individuals from MJTP, Inc. would lose their jobs due to elimination of duplicative activities. The Consulting firm of American Community Partnerships, in their report to the Governor's Office of Economic Opportunity, projected a small increase in staffing would be required by the Department of Labor and Industry as the new administrative entity. In an effort to take advantage of the experience of MJTP Inc. staff and reduce the adverse affects as much as possible, the Department of Labor and Industry will encourage qualified MJTP staff to apply for permanent positions within the Department. The expertise of program and line staff at MJTP, Inc. will likely afford them the ability to competitively apply for permanent positions. In addition, temporary one-year positions will likely be available during the transition year. For qualified MJTP staff that wish to apply for these positions, they will have up to one full year to transition to permanent employment. Local board membership was discontinued, although some members from local areas either were appointed to the State Board in August 2005, or will be considered by the Governor for appointment in the future. In addition, Community Management Teams (CMTs) will be encouraged to take advantage of the expertise and knowledge of past board members, and will be urged to do so. Current SWIB members will also be involved with CMTs.
- f. Several measures have been established to measure the progress and success in implementing the waiver. These measures include; reduced time to issue grant awards, reduced costs associated with administering WIA; increased standardization in service delivery and eligibility; and expansion of the One-Stop System as per the goal established in the original 2-Year Strategic Plan.
- g. The State maintains a sophisticated management information and oversight system that tracks progress of financial and participant goals. Progress will be reviewed on a quarterly basis to ensure that goals are achieved. The SWIB will advise the Governor on specific policy changes needed to achieve the priority areas identified above.
- h. Additional communication strategies will be devised to ensure that citizens throughout the state are informed of progress and provided an opportunity for input into the state's workforce investment system.
- i. Montana also formally requests a waiver of the requirements relating to local area performance in WIA sec. 136(c). Montana, in functioning as a statewide region, will report statewide data and meet applicable state performance requirements without providing data for each local area. This will enable the SWIB to monitor progress throughout the state, take appropriate corrective action promptly, and will lead to improved statewide performance.

Section VI – Major State Policies (pg. 35)

B. What State policies are in place that promote efficient use of administrative resources such as requiring more co-location and fewer affiliate sites in local One-Stop systems to eliminate duplicative facility and operational costs or to require a single administrative structure at the local level to support local boards and to be the fiscal agent for WIA funds to avoid duplicative administrative costs that could otherwise be used for service delivery and training?

MODIFY:

The recommendation of Governor Schweitzer to move to statewide regional planning; his initial designation of Montana's Department of Labor & Industry as the single administrative entity, grant recipient and fiscal agent; the waiver request to allow the State Board to assume the role and responsibilities of two local boards; and the State's continued support of a single statewide MIS and financial system for WIA eliminate duplicative administrative costs in Montana and promote efficient use of administrative resources within the workforce system.

The One-Stop system will be enhanced by: expanding the number of One-Stop Centers, greatly increasing workforce system reach to citizens and business customers; and by increasing sites where co-location and integration are feasible. Additional policies will be considered as the State Workforce Investment Board analyzes its inventory of workforce services.

F. Additional Policies – Transitional and Reallocation

MODIFY TO ADD:

Any reference to a local area or local areas in the original 2-Year plan will now be considered the statewide regional planning area.

Transitional Policies:

Montana SWIB will function as the statewide WIB and will assume responsibilities previously held by local WIBS.

Except where changed in the State Plan, policies listed in the State WIA Policy Manual and Local WIA Policy Manual will be utilized in PY05 for the transition year.

• The SWIB will work to develop a Policy Manual during PY05. They may do so by: revising and adopting the current local area manual and retaining the State Manual; revising and modifying the State WIA policy manual to include provisions for local providers, thereby incorporating the Local and State Manuals; or the SWIB may develop a new policy manual that will incorporate local and state provisions/policies.

The Statewide Workforce Programs and Oversight Bureau will review policies during PY05 with the intent of providing consistency in treatment of system customers and efficiency in operations.

The Consortium Agreement currently established for the One-Stop Center in the CEP will no longer be valid, as MJTP is listed as a partner. The SWIB, now performing local board functions, will immediately begin procedures to develop and implement a consortium agreement with WIA partners for the CEP One-Stop Center in Butte. In accordance with the provisions of Montana's WIA 2-Year Plan, the SWIB will then initiate consortium agreements with WIA partners for other One-Stop Centers in the CEP.

The three One-Stop Operators in the BOS that were solicited through RFP will continue in their current capacity through June 30, 2006. As of July 1, 2006, in accordance with the provisions of Montana's WIA 2-Year Plan, the SWIB will begin procedures to develop and implement consortium agreements with WIA partners for One-Stop Centers in the BOS.

In performing local board functions, the SWIB will work during PY05 to implement a Memorandum(s) of Understanding (MOU) for each local area. The MOU(s) will be signed by the SWIB on behalf of the local area, and each of the One-Stop partners, and will address the operations

of the local One-Stop delivery system. The MOU will describe all of the required MOU elements listed in the WIA Regulations as follows:

The MOU will be:

Signed by the Grant Recipient entity for all mandatory partners;

Address each of the required elements for the WIA Section 121(c);

Define how the parties to the MOU are going to collaborate;

Include policy on confidentiality for sharing of customer information on a "need to know basis"; Include a commitment from partners to work on integrating partner offices and to provide cross training to all field staff.

During PY05, the SWIB will develop recommendations for forming a Youth Council, either as an independent arm of the SWIB, or as a committee that functions collaboratively under the direction of the SWIB.

To allow continuity of services as the state prepares for further efficiencies, local service provider contracts will be honored through June 30, 2006, and administered by the state.

Reallocation Policies:

Currently, MJTP, Inc. receives an obligation notice from the Oversight Bureau, which details the funding each local area will be entitled to expend during the Program Year. MJTP submits requests for funding on a weekly basis. Once the timeline is established, a deadline will be determined for MJTP, Inc. to submit requests for all final expenditures to the Oversight Bureau. In addition, a timeline for the recovery of assets purchased with WIA or JTPA (federal) funds by MJTP, Inc. or the local boards will be determined and expedited.

Additional funding allocations resulting from administrative cost savings will be made to each local area, with the amount based on the relative amount allocated to such area for that funding stream for PY05.

Administrative Policies:

Service providers will use the Montana Department of Labor's WIA participant Management Information System (MTWORKS). Service providers financial systems must meet requirements in the State WIA Policy Manual and OMB Circulars.

Section VII – Integration of One-Stop Service Delivery

No Changes required.

Section VIII – Administration and Oversight of Local WF Investment System (pg. 40)

A. Local Area Designations

- 1. Identify the State's designated local workforce investment areas and the date of the most recent area designation, including whether the State is currently re-designating local areas pursuant to the end of the subsequent designation period for areas designated in the previous $State\ Plan.\ (\S\S112(b)(5).)$
- 2. Include a description of the process used to designate such areas. Describe how the State considered the extent to which such local areas are consistent with labor market areas: geographic areas served by local and intermediate education agencies, post-secondary education institutions and area vocational schools; and all other criteria identified in section

116(a)(1) in establishing area boundaries, to assure coordinated planning. Describe the State Board's role, including all recommendations made on local designation requests pursuant to section 116(a)(4). (§§112(b)(5) and 116(a)(1).)

CURRENT PLAN LANGUAGE:

Montana has two (2) designated local workforce investment areas; the 10 county Concentrated Employment Program (CEP) local area, and the 46 county Balance of State (BOS) local area. These areas were designated under the implementation of the Workforce Investment Act of 1998.

The CEP is an automatic designated area as provided in the WIA of 1998. Montana does not meet the population criteria for more than one other local area, and therefore the BOS is also considered an automatic designated area.

MODIFY TO ADD:

The state has a small populations spread over a large geographic area. In addition, the rural nature of the state presents unique challenges for the workforce system. The Governor intends to designate Montana as a single statewide area when regulations and statute will permit such action. To accommodate current regulatory barriers to this action, and in an effort to create efficiencies needed to accommodate the significant and continuing decline in funding, Governor Schweitzer will designate two areas which will form a consortium and function as a single statewide planning area. When regulatory barriers are removed, the Governor will move toward designating Montana as a single statewide area.

During a SWIB meeting on August 30, 2005, the Governor's designee on the board presented a report describing the statewide regional planning structure, and projecting the estimated reductions in duplicate administrative overhead costs, as well as the projected increases in participant and businesses that would be served under the statewide planning structure. In announcing his new SWIB, Governor Schweitzer charged the members with four goals: to seek greater accountability in the workforce development system; to drive more involvement to the local level; to eliminate unnecessary bureaucracy and duplication of efforts; and to get as many dollars and services to participants as possible. His last point to the board members was to remember the last and the least, in particular Montana's Native Americans. After lengthy discussion and public comment, the SWIB moved unanimously to: direct staff to draft a modification to Montana's 2-Year Strategic Plan to move to a statewide regional planning area; include the provision for applying for a waiver to apply 20 CFR 661.300(f), which permits a state board to carry out the roles of a local board in a single local area, to a statewide regional planning area; allow no less than a 2 week public comment period.

B. Local Workforce Investment Boards -- Identify the criteria the State has established to be used by the chief elected official(s) in the local areas for the appointment of local board members based on the requirements of section 117. (§§112(b)(6), 117(b).)

MODIFY:

Upon approval of the requested waiver to 20CFR 661.300(f), the State Workforce Investment Board will assume the functions of local boards. The Governor took this into consideration when making board appointments in August 2005.

C. How will your State build the capacity of Local Boards to develop and manage high performing

local workforce investment systems? ($\S\S111(d)(2)$ and 112(b)(14).)

MODIFY:

With the shift to a statewide structure, this will not be applicable upon approval of the requested waiver to 20 CFR 661.300(f).

E. Regional Planning ($\S\S112(b)(2)$, 116(c).)

MODIFY AS FOLLOWS:

1. Describe any intra-State or inter-State regions and their corresponding performance measures.

Beginning with the planning cycle for PY'07, a single plan will be developed by the State Workforce Investment Board for the single statewide planning area. The purpose of this statewide plan is to create efficiency and to allow for sharing of information and data across local areas, increasing the amount of funding available for services to customers and creating better alignment of workforce and economic development services. Because this is statewide, performance measures will be those negotiated with USDOL and reflected in this Plan.

2. Include a discussion of the purpose of these designations and the activities (such as regional planning, information sharing and/or coordination activities) that will occur to help improve performance. For example, regional planning efforts could result in the sharing of labor market information or in the coordination of transportation and support services across the boundaries of local areas.

The designation is for the purpose of creating efficiency and is done pending regulatory relief for the designation of a single state area. With limited funding, it is essential that the state identify every opportunity for eliminating duplication to maximize opportunities for our citizens and businesses. This also ensures better alignment of workforce services with economic development, community development and education services and will facilitate improved coordination of state funds to serve high priority groups.

3. For inter-State regions (if applicable), describe the roles of the respective Governors and State and local Boards.

No inter-state regions are planned at this time.

K. Describe the following State policies or procedures that have been developed to facilitate effective local workforce investment systems $(\S\S112(b)(17)(A) \text{ and } 112(b)(2),)$:

MODIFY to ADD:

To ensure a continuum of service delivery during the PY05 transition year, the SWIB will adopt, except where changed in the State Plan, policies listed in the State WIA Policy Manual and Local WIA Policy Manual will be utilized in PY05 for the transition year.

• The SWIB will work to develop a Policy Manual during PY05. They may do so by: revising and adopting the current local area manual and retaining the State Manual; revising and modifying the State WIA policy manual to include provisions for local providers, thereby

incorporating the Local and State Manuals; or the SWIB may develop a new policy manual that will incorporate local and state provisions/policies.

The Statewide Workforce Programs and Oversight Bureau will review policies during PY05 with the intent of providing consistency in treatment of system customers and efficiency in operations.

The Consortium Agreement currently established for the One-Stop Center in the CEP will no longer be valid, as MJTP is listed as a partner (should have been with the local boards, not their administrative entity). The SWIB (now performing local board functions) will immediately begin procedures to develop and implement a consortium agreement with WIA partners for the CEP One-Stop Center in Butte. In accordance with the provisions of Montana's WIA 2-Year Plan, the SWIB will then initiate consortium agreements with WIA partners for other One-Stop Centers in the CEP.

The three One-Stop Operators in the BOS that were solicited through RFP will continue in their current capacity through June 30, 2006. As of July 1, 2006, in accordance with the provisions of Montana's WIA 2-Year Plan, the SWIB will begin procedures to develop and implement consortium agreements with WIA partners for One-Stop Centers in the BOS.

In performing local board functions, the SWIB will work during PY05 to implement a Memorandum(s) of Understanding (MOU) for each local area. The MOU(s) will be signed by the SWIB on behalf of the local area, and each of the One-Stop partners, and will address the operations of the local One-Stop delivery system. recognize the participant eligibility definitions and the One Stop

IX. Service Delivery (pg. 55)

Describe the approaches the State will use to provide direction and support to local Boards and the One-Stop Career Center delivery system on the strategic priorities to guide investments, structure business engagement, and inform service delivery approaches for all customers. (§§112(b)(17)(A) Activities could include:

- A. One-Stop Service Delivery Strategies: $(\S112(b)(2) \text{ and } 111(d)(2).)$
 - 1. How will the services provided by each of the required and optional One-Stop partners be coordinated and made available through the One-Stop system? $(\S112(b)(8)(A).)$

MODIFY:

The Consortium Agreement currently established for the One-Stop Center in the CEP will no longer be valid, as MJTP is listed as a partner (should have been with the local boards, not their administrative entity). The SWIB (now performing local board functions) will immediately begin procedures to develop and implement a consortium agreement with WIA partners for the CEP One-Stop Center in Butte. In accordance with the provisions of Montana's WIA 2-Year Plan, the SWIB will then initiate consortium agreements with WIA partners for other One-Stop Centers in the CEP.

The three One-Stop Operators in the BOS that were solicited through RFP will continue in their current capacity through June 30, 2006. As of July 1, 2006, in accordance with the provisions of Montana's WIA 2-Year Plan, the SWIB will begin procedures to develop and implement consortium agreements with WIA partners for One-Stop Centers in the BOS.

In performing local board functions, the SWIB will work during PY05 to implement a Memorandum(s) of Understanding (MOU) for each local area. The MOU(s) will be signed by the SWIB on behalf of the local area, and each of the One-Stop partners, and will address the operations of the local One-Stop delivery system.

C. Adults and Dislocated Workers

- 1. Core Services. $\S 112(b)(17)(a)(i)$.
 - a. Describe state strategies and policies to ensure adults and dislocated workers have universal access to the minimum required core services as described in $\S134(d)(2)$.
 - b. Describe how the state will ensure the three-tiered service delivery strategy for labor exchange services for job seekers and employers authorized by the Wagner-Peyser Act includes: (1) self-service, (2) facilitated self-help service, and (3) staff-assisted service, and is accessible and available to all customers at the local level.
 - c. Describe how the state will integrate resources provided under the Wagner-Peyser Act and WIA Title I for adults and dislocated workers as well as resources provided by required One-Stop partner programs, to deliver core services.

MODIFY:

Montana integrates labor exchange activities with WIA Title I services by requiring at least one certified One-Stop Center in each local workforce area. Additional One-Stop locations are developed based on the needs of local communities and tribal nations, and as criteria are met, the One-Stops are certified. Montana's State Board has established a goal of implementing a minimum of ten certified One-Stops during the first two years of this strategic plan, and will work closely with local elected officials, businesses and communities to promote successful completion of this goal.

As the state transitions to a single statewide planning area, during PY05 Montana will follow the procedures outlined in Section VIII (K) as modified above.

X. State Administration (pg. 79)

C. Describe how any waivers or workflex authority (both existing and planned) will assist the State in developing its workforce investment system. (\S189(i)(1)$, 189 (i)(4)(A), and 192.)

ORIGINAL PLAN:

Currently the State has a waiver request to extend the time limit on the period of initial eligibility of training providers. The waiver extension will allow Montana to better determine the most effective and efficient method of collecting training provider performance data, as well as alleviate provider concerns with the types and amount of information being requested. Any requests for waiver or workflex authority would be for the sole purpose of further development and enhancement of the workforce system.

Montana is committed to using as much flexibility as possible through the use of waivers to address local workforce needs specific to a rural state and its rural communities and tribal nations. Montana's low population density, coupled with the nation's fourth largest geographic area, puts the State in a position to take advantage of the use of waivers to be innovative in our approach to meet these unique rural needs.

MODIFY TO ADD:

Single State Board:

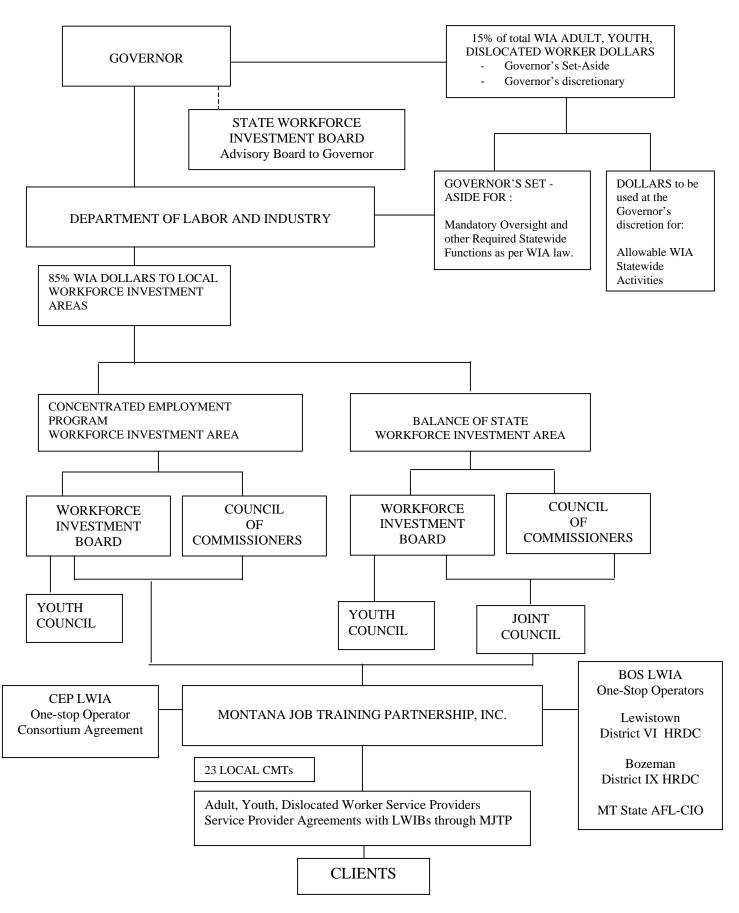
The State is proposing designation of two workforce areas, development of a single statewide plan for the single statewide planning area, and establishing a consortium of the two areas to conduct business using a single administrative agency. As part of this plan, Montana is requesting a waiver to apply 20 CFR 551.300(f) which permits the state board to carry out the roles of a local board in a single area state, to a single statewide planning area. The waiver will allow functioning of the state as a single workforce planning area governed by a single board. This will allow the state to meet many of the goals outlined in Section II of this plan including:

- o Eliminate Duplicative Administrative Systems and Maximize Opportunities for training;
- o Expand Montana's One-Stop System;
- o Improve and expand collaboration of partners and integration of services;
- o Increase the use of Waivers to address rural needs in Montana.

XI. Assurances

No Changes required.

ATTACHMENT I (a.) -- Previous Workforce System Org. Chart



ATTACHMENT I (b.) -- Single Statewide Planning Area Workforce System Org. Chart

